

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MARY P. DORSEY, Individually and as
Administrator of the Estate of James Dorsey,

Plaintiff,

V.

Civil Action No. 05-10639-REK

PFIZER, INC., WARNER LAMBERT
COMPANY, and PARKE-DAVIS, a division
of Warner-Lambert Company,

Defendants.

JOINT MOTION FOR TRANSFER

Plaintiff, Mary Dorsey, Individually and as Administrator of the Estate of James Dorsey (“Ms. Dorsey”), and defendants, Pfizer Inc., Warner-Lambert Company, and Parke-Davis, a division of Warner-Lambert Company (together, “Defendants”), jointly move pursuant to Local Rule 40.1(I) for the transfer of this action to Judge Saris, before whom is pending the Multidistrict Litigation entitled In re Neurontin Marketing, Sales Practices and Products Liability Litigation, MDL Docket No. 1629, the primary subject of which is the very alleged marketing program that is at the heart of Ms. Dorsey’s case. The grounds for this motion are set forth in the accompanying memorandum.

MARY A. DORSEY, Individually and as
Administrator of the Estate of James Dorsey,

By her Attorneys,

s/Timothy J. Perry

Timothy J. Perry
BBO No. 631397
PRETI FLAHERTY LLP
10 High Street, Suite 502
Boston, MA 02110

PFIZER INC., et al.,

By their attorneys,

s/James P. Rouhandeh

James P. Rouhandeh
James E. Murray
Deborah L. MacGregor
DAVIS POLK & WARDWELL
450 Lexington Avenue
New York, New York 10017
(212) 450-4000

-and-

s/David B. Chaffin

David B. Chaffin
BBO No. 549245
HARE & CHAFFIN
160 Federal Street
Boston, Massachusetts 02110
(617) 330-5000

Dated: October 18, 2005